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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**VIA FEDERAL EXPRESS**

Mr. Ron Parver  
Cable Services Bureau  
Federal Communications Commission  
Room 4-A822  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

**RE: Request For Information - Cable System Capacity and Retransmission Consent Agreements**

Dear Mr. Parver:

Enclosed please find our response to the Commission's request for information regarding our anticipated plans to upgrade cable system capacity, as well as the progress in our negotiations with television broadcast stations for retransmission consent with respect to their digital signals.

As you may know, Insight has led the cable television industry in offering, under the Insight Digital brand, a complete bundle of interactive digital video, high-speed data access and telephony services. Our strategy is to be a competitive, full-service provider of entertainment, information and communications services, and is centered on the deployment of new and enhanced products and services for the communities we serve.

Specifically, we have designed a more extensive digital product that is rich in program offerings and highly interactive with our customers, including a video-on-demand service, an interactive program guide and interactive local information and community guides. Further, in addition to our local Internet and telephony services, we have plans to open an electronic mall with 50 retail outlets. The implementation of interactive digital technology will significantly enhance and expand the video service offerings provided to the residents of the communities Insight serves.

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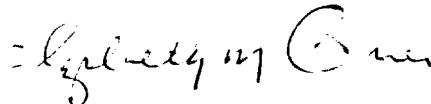
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Mr. Ron Parver  
Federal Communications Commission  
4 June 2001  
Page 2 of 2

I have attached for your reference a copy of the current channel line-up for our Louisville, Kentucky cable system, indicating the channel bandwidth designated to each service offered and/or reserved for future use. Please note that although the system has been rebuilt to 750 MegaHertz, we are utilizing approximately 93% of the available bandwidth for our current service offerings, including interactive digital video, with the remaining balance reserved for increased penetration of our new and enhanced products such as video-on-demand and telephony.

Please note that these plans are subject to change, and all information and data provided are only estimates. Future changes in our industry, market conditions, technology, management or other reasons could cause us to revise these projections.

Very truly yours,

A handwritten signature in black ink, appearing to read "Elizabeth M. Grier", is written over a horizontal line.

Elizabeth M. Grier  
Vice President, Administration

cc: Colleen Quinn, Senior V.P., Corporate Relations

Enc.

## Questions on Cable System Capacity and Retransmission Consent Agreements

### Question 1

Please complete the following table with the total number of subscribers served by all of your cable systems and your best estimates of the percentage of your total subscribers in each year that will be served by cable systems of the specified capacity. For each year the column percentages for the five system capacity classes ("Under 500 MHz" to ">750 MHz") should sum to 100.

#### TOTAL NUMBER OF SUBSCRIBERS SERVED AND % DISTRIBUTION BY SYSTEM CAPACITY

Cable System Capacity	Yearend 1999		Yearend 2000		Yearend 2001		Yearend 2002		Yearend 2003	
	929,691		1,040,556		1,398,877		1,412,866		1,426,995	
	Number	%	Number	%	Number	%	Number	%	Number	%
Cable System Capacity										
>750 MHz	N/A <sup>1</sup>									
750 MHz	522,486	56.2%	836,607	80.4%						
Between 550 and 750 MHz	28,542	3.07%	29,136	2.8%						
550 MHz	43,045	4.63%	12,487	1.2%						
Under 500 MHz	321,673	34.6%	122,786	11.8%						
Total		100%		100%		100%		100%		100%

<sup>1</sup> the amount of plant we have greater than 750 MHz is immaterial, and therefore not "representative"

## Question 2

Please provide, for each of the five capacity classes and for each year, a breakdown of the total MHz usable for downstream transmissions. The breakdown should be based on a representative cable system in each size class, specifically the one with the largest number of subscribers. For the >750, <550, and 550-750 MHz capacity classes, please specify the capacity of the system for which the information is being provided.

If the total downstream capacity does not equal total capacity minus the bandwidth below 54 MHz, please explain the discrepancy. Also please note if any capacity above 54 MHz is used for upstream services. Please provide the total MHz expected to be used for analog video transmission, the total MHz expected to be used for digital video transmission, and the total MHz expected to be used for other purposes, and list the anticipated other services. The sum of the total MHz used for analog, digital, and other downstream services should equal total MHz usable for downstream transmissions.

### YEAR 1999

Capacity of Representative Cable System	Specific Capacity	Total MHz usable for downstream transmissions	Total MHz expected to be used for analog video	Total MHz expected to be used for digital video	Total MHz expected to be used for other downstream services+
>750 MHz*	N/A				
750 MHz		684	486	150	48
550-750 MHz**	600 <sup>1</sup>	534	486	42	6
550 MHz		480	420	54	6
< 550 MHz***	402	342	318	18	6

+Identify any other downstream services

<sup>1</sup>91.7% of system plant

**YEAR 2000**

Capacity of Representative Cable System	Specific Capacity	Total MHz usable for downstream transmissions	Total MHz expected to be used for analog video	Total MHz expected to be used for digital video	Total MHz expected to be used for other downstream services+
>750 MHz*	N/A				
750 MHz		684	486	150	48
550-750 MHz**	600 <sup>1</sup>	534	450	78	6
550 MHz <sup>2</sup>		480	456	18	6
< 550 MHz***	414 <sup>3</sup>	354	330	18	6

+ Identify any other downstream services

**YEAR 2001**

Capacity of Representative Cable System	Specific Capacity	Total MHz usable for downstream transmissions	Total MHz expected to be used for analog video	Total MHz expected to be used for digital video	Total MHz expected to be used for other downstream services+
>750 MHz*	N/A				
750 MHz		684	486	150	48
550-750 MHz**	600	534	450	78	6
550 MHz		480	444	36	0
< 550 MHz***	402	342	342	0	0

+ Identify any other downstream services

<sup>1</sup>85.8% of system plant

<sup>2</sup>93.2% of system plant

<sup>3</sup>78% of system plant

**YEAR 2002**

Capacity of Representative Cable System	Specific Capacity	Total MHz usable for downstream transmissions	Total MHz expected to be used for analog video	Total MHz expected to be used for digital video	Total MHz expected to be used for other downstream services+
>750 MHz*	N/A				
750 MHz		684	456	174 <sup>1</sup>	54
550-750 MHz**	N/A				
550 MHz		480	438	36	6
< 550 MHz***	306	246	246	0	0

+ Identify any other downstream services

**YEAR 2003**

Capacity of Representative Cable System	Specific Capacity	Total MHz usable for downstream transmissions	Total MHz expected to be used for analog video	Total MHz expected to be used for digital video	Total MHz expected to be used for other downstream services+
>750 MHz*	N/A				
750 MHz		684	456	174 <sup>1</sup>	54
550-750 MHz**	N/A				
550 MHz		480	420	54	6
< 550 MHz***	306	246	228	18	0

+ Identify any other downstream services

<sup>1</sup>by 2002, we anticipate removing certain channels thereby recapturing some analog spectrum in order to offer HD programming

- \* fill in a capacity greater than 750 MHz if applicable, or enter NA if no systems in the >750 MHz category
- \*\* fill in a capacity between 550 and 750 MHz if applicable, or enter NA if no systems in the 550-750 MHz category
- \*\*\* fill in a capacity below 550 MHz if applicable, or enter NA if no systems in the <550 MHz category

Please explain here any discrepancies between capacity usable for downstream transmissions and total capacity minus the bandwidth below 54 MHz.

See Attachment A appended hereto.

### Question 3

For each capacity class and year entered in question 2, please provide (i) information on the digital modulation techniques you intend to use and (ii) a further breakdown of the total MHz expected to be used for downstream digital video transmission. To answer this question, use the same representative cable systems that you used in question 2. What modulation technique do you expect to use (e.g., 64 QAM, 256 QAM)? How many MHz do you anticipate devoting to HDTV transmissions and how many HDTV program streams do you anticipate transmitting in each 6 MHz of spectrum devoted to that purpose? How many MHz do you anticipate devoting to standard definition television program streams and how many such program streams do you anticipate transmitting in each 6 MHz of spectrum devoted to that purpose?

NOTE: If you plan to use different modulation techniques on a single system or on different systems in the same capacity class, please explain below. If the number of HDTV or SDTV program streams per 6 MHz is expected to vary, please indicate a typical figure in the table and explain the range of variation below.

#### YEAR 1999

Capacity of Representative Cable System	Specific Capacity	Total MHz expected to be used for digital video transmission (from question 2)	Modulation technique	MHz expected to be devoted to HDTV transmissions (broadcast or nonbroadcast)	HDTV Program streams per 6 MHz	MHz expected to be devoted to standard definition video	SDTV program streams per 6 MHz
>750 MHz*	N/A <sup>1</sup>						
750 MHz		150	64QAM	0	N/A	150	8-12 <sup>2</sup>
550-750 MHz**	600 <sup>3</sup>	42	64QAM	0	N/A	42	8-12 <sup>2</sup>
550 MHz		54	64QAM	0	N/A	54	8-12 <sup>2</sup>
<550 MHz***	402 <sup>4</sup>	18	64QAM	0	N/A	18	8-12 <sup>2</sup>

<sup>1</sup> the amount of plant we have greater than 750 MHz is de minimus, and therefore neither material nor representative

<sup>2</sup> video-on-demand channels have 8 SDTV program streams per 6MHz each - all other channels have up to a maximum of 12 SDTV program streams per 6MHz-however, the actual number is typically less for sports and movie services in order to ensure a high quality signal.

<sup>3</sup> 91.7% of system plant

<sup>4</sup> 64.4% of system plant



**YEAR 2000**

Capacity of Representative Cable System	Specific Capacity	Total MHz expected to be used for digital video transmission (from question 2)	Modulation technique	MHz expected to be devoted to HDTV transmissions (broadcast or nonbroadcast)	HDTV Program streams per 6 MHz	MHz expected to be devoted to standard definition video	SDTV program streams per 6 MHz
>750 MHz*							
750 MHz		150	64QAM	0	N/A	150	8-12 <sup>1</sup>
550-750 MHz**	600 <sup>2</sup>	78	64QAM	0	N/A	78	8-12 <sup>1</sup>
550 MHz <sup>3</sup>		18	64QAM	0	N/A	18	8-12 <sup>1</sup>
<550 MHz***	414 <sup>4</sup>	18	64QAM	0	N/A	18	8-12 <sup>1</sup>

**YEAR 2001**

Capacity of Representative Cable System	Specific Capacity	Total MHz expected to be used for digital video transmission (from question 2)	Modulation technique	MHz expected to be devoted to HDTV transmissions (broadcast or nonbroadcast)	HDTV Program streams per 6 MHz	MHz expected to be devoted to standard definition video	SDTV program streams per 6 MHz
>750 MHz*							
750 MHz		150	64QAM	0	N/A	150	8-12 <sup>1</sup>
550-750 MHz**	600	78	64QAM	0	N/A	78	8-12 <sup>1</sup>
550 MHz		36	64QAM	0	N/A	36	8-12 <sup>1</sup>
<550 MHz***	402	0	N/A	N/A	N/A	N/A	N/A

<sup>1</sup>video-on-demand channels have 8 SDTV program streams per 6MHz each - all other channels have up to a maximum of 12 SDTV program streams per 6 MHz-however, the actual number is typically less for sports and movie services in order to ensure a high quality signal

<sup>2</sup>85.8% of system plant

<sup>3</sup>93.2% of system plant

<sup>4</sup>78% of system plant

**YEAR 2002**

Capacity of Representative Cable System	Specific Capacity	Total MHz expected to be used for digital video transmission (from question 2)	Modulation technique	MHz expected to be devoted to HDTV transmissions (broadcast or nonbroadcast)	HDTV Program streams per 6 MHz	MHz expected to be devoted to standard definition video	SDTV program streams per 6 MHz
>750 MHz*							
750 MHz		174	64QAM	24 <sup>2</sup>	1	150	8-12 <sup>1</sup>
550-750 MHz**	N/A						8-12 <sup>1</sup>
550 MHz		36	64QAM	0	N/A	36	8-12 <sup>1</sup>
<550 MHz***	306	0	N/A	N/A	N/A	N/A	N/A

**YEAR 2003**

Capacity of Representative Cable System	Specific Capacity	Total MHz expected to be used for digital video transmission (from question 2)	Modulation technique	MHz expected to be devoted to HDTV transmissions (broadcast or nonbroadcast)	HDTV Program streams per 6 MHz	MHz expected to be devoted to standard definition video	SDTV program streams per 6 MHz
>750 MHz*							
750 MHz		174	64QAM	24	1	150	8-12 <sup>1</sup>
550-750 MHz**							
550 MHz		54	64QAM	0	N/A	54	8-12 <sup>1</sup>
<550 MHz***	306	18	64QAM	0	N/A	18	8-12 <sup>1</sup>

\* fill in a capacity greater than 750 MHz if applicable, or enter NA if no systems in the >750 MHz category

<sup>1</sup> video-on-demand channels have 8 SDTV program streams per 6 MHz, each-all other channels have up to a maximum of 12 SDTV program streams per 6 MHz-however, the actual number is typically less for sports and movie services in order to ensure a high quality signal

<sup>2</sup> we except to recover four (4) analog channels and reuse for HDTV programming

\*\* fill in a capacity between 550 and 750 MHz if applicable, or enter NA if no systems in the 550-750 MHz category  
\*\*\* fill in a capacity below 550 MHz if applicable, or enter NA if no systems in the <550 MHz category

Please describe here any situations in which you plan to use different modulation techniques on a single system or on different systems in the same capacity class.

If the number of HDTV program streams per 6 MHz is expected to vary, please explain the range of variation here.

If the number of SDTV program streams per 6 MHz is expected to vary, please explain the range of variation here.

video-on-demand channels have 8 streams each- all other channels have up to 12 SDTV program streams per 6MHz (however, it is typically less for sports and movie services)

Question 4

On Chart 4A below, please list the cable systems and television stations for which you have negotiated retransmission consent agreements that include carriage of digital transmissions by the station. For each television station, please include in parentheses the network affiliation if any. Please include, if known, the capacity of each system in MHz, the Designated Market Area ("DMA") in which the station is located, when digital carriage is scheduled to commence, the modulation technique you intend to use (e.g., 8 VSB, 64 QAM, 256 QAM), the format (480P, 720P, 1080I, something else) of the signal as received from the broadcaster, and the format that you plan to use for retransmission through the system to subscribers.

On Chart 4B below, please provide the best information available at this time on pending retransmission consent negotiations, if possible. If you have pending negotiations with respect to more than 10 systems, please provide information for the five largest and the five smallest systems, measured by number of subscribers.

Note: If you have signed digital retransmission agreements with a television station for more than one cable system, please make a separate entry for each cable system.

Please use additional pages if necessary for response.

There are no current digital carriage requirements in our Agreements. However, our deals have a provision that if we negotiate carriage of digital with a station, we will enter into negotiations with the remaining DMA retrans station deals for digital carriage.

CHART 4A: COMPLETED RETRANSMISSION CONSENT AGREEMENTS

DMA	Television Station (with affiliation status)	Cable System	System Capacity (MHz)	Date Carriage Commenced or is to Commence	Modulation Technique	Broadcast Transmission Format	Retransmission Format	Number of Stations in DMA now transmitting a digital signal

CHART 4B: RETRANSMISSION CONSENT AGREEMENTS IN NEGOTIATION

DMA	Television Station (with affiliation status)	Cable System	System Capacity (MHz)	Date Carriage is to Commence	Modulation Technique	Broadcast Transmission Format	Retransmission Format	Number of Stations in DMA now transmitting a digital signal

## **ATTACHMENT A**

### **Question 2.**

**“If the total downstream capacity does not equal total capacity minus the bandwidth below 54 MHz, please explain the discrepancy.**

- a) there are aeronautical as well as FM radio frequencies which are not being used;
- b) there is a 4 MHz gap between channels 4 and 5;
- c) there is a 2 MHz gap between channels 6 and A-5; and
- d) channels are used for analog and digital converter box control

### **“Other” downstream services expected to be used**

- 1) Local Internet service - at lightening speed.
- 2) Telephony services - offering consumers a choice of local phone carriers.

### **Digital video services expected to be used**

- 1) LocalSource – interactive community news and information platform
- 2) Video on Demand - allowing for more viewing options of up to 500 movie titles viewable whenever our consumers want, with full VCR functionality
- 3) Plans to open an electronic mall with 50 retail outlets

The implementation of interactive digital technology will significantly enhance and expand the video service offerings provided to the residents of the communities Insight serves. Because of the [increased bandwidth and] two-way transmission capability of Insight’s state of the art technical platform, which is being built in conjunction with Insight’s digital launches, Insight has the capacity to design a more extensive digital product that is rich in program offerings and highly interactive with its customers.

### **Digital Transition**

In order to achieve the foregoing, Insight alone has invested more than \$500 million dollars in the last five (5) years.

- our rebuilds are substantially completed
- we are committed to carry the digital equivalent of today’s analog broadcast stations when broadcasters return their analog spectrum
- we have agreed to carry the primary signal of broadcasters who return their analog spectrum and become digital-only broadcasters early

We will continue to provide consumers complete access to the broadcast channels they enjoy today. However, dual must-carry is neither pro-consumer nor will it speed the digital transition because it does not encourage consumer migration to digital. Dual carriage would confiscate an additional 6MHz of scarce channel capacity for programming services that do not even exist yet, or may never exist. Consumers benefit if cable operators are free to use their digital capacity for the things consumers want.

5/24/2001 12:00				OKOLONA, KY LOUISVILLE, KY OM-1000 1-6		
CHANNEL	CHANNEL			OKOLONA	TIER	SECURITY
BANDWIDTH	LTTR.	EIA	MAP			
54-60MHz	2	2		WAVE	Basic	
60-66MHz	3	3		TWC	Basic	
66-72MHz	4	4		WHAS	Basic	
76-82MHz	5	5		WLKY	Basic	
82-88MHz	6	6		AD SALES	Basic	
90-96MHz	A-5	95	82	MTV2/SPICE	PPV	GI Scrambled
96-102MHz	A-4	96	81	GAME / PLAYBOY	PPV	GI Scrambled
102-108MHz	A-3	97		Analog Data Stream		
108-114MHz	A-2	98		ACCESS	Basic	
114-120MHz	A-1	99		PREVIEW	Basic	
120-126MHz	A	14		C-SPAN 2	Basic	
126-132MHz	B	15		KET 2	Basic	
132-138MHz	C	16		SHOW	Premium	Negative Trap
138-144MHz	D	17		HBO	Premium	Negative Trap
144-150MHz	E	18		HBO PLUS	Premium	Negative Trap
150-156MHz	F	19		FAITH	Basic	
156-162MHz	G	20		WGN	Basic	
162-168MHz	H	21		WBNA	Basic	
168-174MHz	I	22		HSN	Basic	
174-180MHz	J	7		WBKI	Basic	
180-186MHz	8	8		COMMUNITY	Basic	
186-192MHz	9	9		WDRB	Basic	
192-198MHz	10	10		WFTE	Basic	
198-204MHz	11	11		C-SPAN	Basic	
204-210MHz	12	12		TLC	Basic	
210-216MHz	13	13		KET	Basic	
216-222MHz	J	23		QVC	Basic	
222-228MHz	K	24		WYCS	Basic	
228-234MHz	L	25		GOV Access	Basic	
234-240MHz	M	26		AMC	Classic	Negative Trap
240-246MHz	N	27		TBS	Classic	Negative Trap
246-252MHz	O	28		FX	Classic	Negative Trap
252-258MHz	P	29		DISNEY	Classic	Negative Trap
258-264MHz	Q	30		ESPN 2	Classic	Negative Trap
264-270MHz	R	31		FOX NEWS	Classic	Negative Trap
270-276MHz	S	32		OXYGEN	Classic	Negative Trap
276-282MHz	T	33		USA	Classic	Negative Trap
282-288MHz	U	34		CNN	Classic	Negative Trap
288-294MHz	V	35		LIFETIME	Classic	Negative Trap
294-300MHz	W	36		A&E	Classic	Negative Trap
300-306MHz	AA	37		MTV	Classic	Negative Trap
306-312MHz	BB	38		DISCOVERY	Classic	Negative Trap
312-318MHz	CC	39		CNBC	Classic	Negative Trap
318-324MHz	DD	40		FAMILY	Classic	Negative Trap
324-330MHz	EE	41		TNN	Classic	Negative Trap
330-336MHz	FF	42		NICK	Classic	Negative Trap
336-342MHz	GG	43		TNT	Classic	Negative Trap
342-348MHz	HH	44		ESPN	Classic	Negative Trap
348-354MHz	II	45		MSNBC	Classic	Negative Trap
354-360MHz	JJ	46		FOOD	Classic	Negative Trap
360-366MHz	KK	47		VH 1	Classic	Negative Trap
366-372MHz	LL	48		HEADLINE NEWS	Classic	Negative Trap
372-378MHz	MM	49		BET	Classic	Negative Trap
378-384MHz	NN	50		UNIVISION	Classic	Negative Trap
384-390MHz	OO	51		HGTV	Classic	Negative Trap
390-396MHz	PP	52		CARTOON	Classic	Negative Trap
396-402MHz	QQ	53		COURT	Classic	Negative Trap
402-408MHz	RR	54		HISTORY	Classic	Negative Trap
408-414MHz	SS	55		FOX SPORTS OHIO	Classic	Negative Trap
414-420MHz	TT	56		E I	Classic	Negative Trap
420-426MHz	UU	57		TVG	Classic	Negative Trap
426-432MHz	VV	58		BRAVO	Classic	Negative Trap
432-438MHz	WW	59		COMEDY	Classic	Negative Trap
438-444MHz	VV	60		ANIMAL PLANET	Classic	Negative Trap